

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GULF UNDERWRITERS INS. CO.,
as Subrogee of Games and Lanes, Inc.

Plaintiff,

vs.

INTERNATIONAL BAR TECH SOLUTIONS,
INC.

Defendant.

CASE NO: 04-30203-MAP

JOINT MOTION TO AMEND JULY 8, 2005 REVISED SCHEDULING ORDER

Plaintiff, Gulf Underwriters Ins. Co., as subrogee of Games and Lanes, Inc., and Defendant, International Bar Tech Solutions, Inc. hereby move to Amend the July 8, 2005 Revised Scheduling Order dates as follows:

1. On July 8, 2005, the Court issued a revised Scheduling Order, setting forth the following dates:

Non-Expert Depositions completed by:	October 28, 2005
Plaintiff's trial experts disclosed by:	December 2, 2005
Defendant's trial experts disclosed by:	January 20, 2006
Expert depositions completed by:	March 3, 2006
Case Management Conference:	March 9, 2006 @ 10:00 a.m.

2. The parties are conducting discovery, and have conducted seven depositions to date. An additional deposition is scheduled for December 1, 2005.
3. Additional depositions are also being scheduled for December, 2005 and January, 2006.
4. Depositions have been difficult to schedule, as they involve a number of governmental employees and former employees, as well as representatives of a company that is no longer in business.

5. Discovery is ongoing, but as yet, incomplete.
6. The parties propose that the Court's Scheduling Order be amended as follows:

Written discovery completed:	January 30, 2006
Non-expert depositions completed by:	January 30, 2006
Plaintiff's trial experts disclosed by:	February 1, 2006
Defendant's trial experts disclosed by:	March 1, 2006
Expert depositions completed by:	April 1, 2006

7. The parties propose that the Case Management Conference scheduled for March 9, 2006 remain as scheduled.

WHEREFORE, the parties jointly request that this Honorable Court Amend the July 8, 2005 Revised Scheduling Order as set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, hereby certify that on December 1, 2005, I electronically file the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record for all parties.

/s/ Christina L. Weeks /
Christina L. Weeks

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